

Part 70 Operating Permit Amendment

Permit Amendment No.: 2631-021-0001-V-04-2 **Effective Date:** September 4, 2015

Facility Name: **Graphic Packaging International, Inc. – Macon Mill**
100 Graphic Packaging International Way
Macon, Georgia 31206, Bibb County

Mailing Address: 100 Graphic Packaging International Way
Macon, Georgia 31206

Parent/Holding Company: Graphic Packaging International, Inc.

Facility AIRS Number: 04-13-021-00001

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

The modification to the No. 1 Paper Machine, Recycle Mill, and associated emission units, and the installation and operation of a new high density (HD) pulp storage tank.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2631-021-0001-V-04-0. Unless modified or revoked, this Permit Amendment expires upon issuance of the next Part 70 Permit for this source.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 23156 dated March 5, 2015; any other applications upon which this Permit Amendment or Permit No. 2631-021-0001-V-04-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **10** pages, which pages are a part of this Permit Amendment, and which hereby become part of Permit No. 2631-021-0001-V-04-0.

[Signed]

Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

Graphic Packaging International, Inc. – Macon Mill (hereafter GPI) proposed to make modifications to existing equipment at the Macon Mill facility including the No. 1 Paper Machine, the Recycle Mill, blow heat recovery system for the Batch (chip) Digesters, and the stock preparation and coatings and additives equipment associated with the operation of the No. 1 Paper Machine. GPI is also planning to install an additional HD pulp storage tank with a capacity of 500 tons to allow for additional storage of pulp.

PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY

2.1 Facility Wide Emission Caps and Operating Limits

None applicable.

2.2 Facility Wide Federal Rule Standards

None applicable.

2.3 Facility Wide SIP Rule Standards

None applicable.

2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

None applicable.

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PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.1 Modified and Additional Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
A002-A010	Batch Digesters (9)	40 CFR 60 Subpart BB 40 CFR 63 Subpart S 391-3-1-.02(2)(gg)	3.3.12, 3.3.13, 3.3.14, 3.3.15, 3.3.16, 3.3.20, 3.3.22, 3.3.24, 3.3.26, 3.3.29, 3.3.37, 4.2.13, 4.2.14, 5.2.5, 5.2.6, 6.1.7, 6.2.9, 6.2.10, 6.2.12, 6.2.46, 6.2.47, 6.2.48,	D001, L001, or L002	Gases routed to No. 3 Recovery Boiler or Nos. 1 or 2 Lime Kilns
P00A	Nos. 1 and 2 Paper Machines	391-3-1-.02(2)(g) 40 CFR 52.21(j)	3.3.38, 3.3.39, 3.3.40, 3.4.13, 4.2.17, 5.2.2, 5.2.13, 6.1.7, 6.2.22, 6.2.24 through 6.2.27, 6.2.52	None	None
R901	Recycle Mill	None	None	None	None
C901	Coating and Additives System	None	None	None	None
	HD Pulp Storage Tank – 500 tons	None	None	None	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

3.2 Equipment Emission Caps and Operating Limits

None Applicable.

3.3 Equipment Federal Rule Standards

No. 1 Paper Machine

- 3.3.38 The Permittee shall not cause, let, suffer, permit or allow the emission of carbon monoxide (CO) from the No. 1 Paper Machine (Source Code P00A) in amounts equal to or exceeding 0.082 lb/MMBtu heat input, excluding periods of startup, shutdown, and malfunction.
[40 CFR 52.21(j)]
- 3.3.39 The Permittee shall only burn natural gas in the No. 1 Paper Machine (Source Code P00A) dryer burners.
[40 CFR 52.21(j)]
- 3.3.40 The Permittee shall perform tune-ups every 24 months on the dryer burners on the No. 1 Paper Machine (Source Code P00A).
[40 CFR 52.21(j)]

3.4 Equipment SIP Rule Standards

None Applicable.

3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

None Applicable.

PART 4.0 REQUIREMENTS FOR TESTING

4.1 General Testing Requirements

MODIFIED CONDITION

- 4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard.
[391-3-1-.02(8)(a) and 391-3-1-.02(9)(a)]

4.2 Specific Testing Requirements

No. 1 Paper Machine

- 4.2.17 The Permittee shall conduct a tune-up on the No. 1 Paper Machine dryer burners within 24 months of completion of the initial modifications to the No. 1 Paper Machine as part of the Strategic Improvement Project. Tune-ups must be conducted no more than 24 months after the previous tune-up to demonstrate continuous compliance.
[40 CFR 52.21(j)]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**5.1 General Monitoring Requirements**

- 5.1.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.
[391-3-1-.02(6)(b)1]

5.2 Specific Monitoring RequirementsNo. 1 Paper Machine

- 5.2.13 The Permittee shall perform tune ups of the No. 1 Paper Machine dryer burners as required by Condition 4.2.17 in a manner consistent with good combustion practices and using the following procedures:
[40 CFR 52.21(j)]
- a. Inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
 - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
 - c. Maintain on-site and submit, if requested by the Administrator, a report containing a description of any corrective actions taken as a part of the tune-up.

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements****MODIFIED CONDITION**

- 6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a – c. [Unchanged]

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- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:

No. 1 Paper Machine

- x. Any time of process operation during which the No. 1 Paper Machine dryer burners are fired with a fuel other than natural gas.
[40 CFR 52.21(j)]
- xi. Any time in which the No. 1 Paper Machine does not comply with the tune-ups outlined in Condition 3.3.40, 4.2.17, and 5.2.13.
[40 CFR 52.21(j)]

6.2 Specific Record Keeping and Reporting Requirements

No. 1 Paper Machine

- 6.2.52 The Permittee shall maintain records of work performed on the No. 1 Paper Machine during the tune-ups required by Condition 3.3.40. These records shall be included in the report required by Condition 6.1.4 during the calendar quarter that the tune-up is performed.
[40 CFR 52.21(j)]

PART 7.0 OTHER SPECIFIC REQUIREMENTS

7.1 Operational Flexibility Associated with this Amendment

7.2 Off-Permit Changes Associated with this Amendment

7.3 Alternative Requirements Associated with this Amendment

Not Applicable.

7.4 Insignificant Activities Associated with this Amendment

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

7.5 Temporary Sources Associated with this Amendment

[391-3-1-.03(10)(d)5 and 40 CFR 70.6(e)]

Not Applicable.

7.6 Short-term Activities Associated with this Amendment

(see Form D5 “Short Term Activities” of the Permit application and White Paper #1)

Not Applicable.

7.7 Compliance Schedule/Progress Reports Associated with this Amendment

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(4)]

Not Applicable.

7.8 Emissions Trading Associated with this Amendment

[391-3-1-.03(10)(d)1(ii) and 40 CFR 70.6(a)(10)]

Not Applicable.

7.9 Acid Rain Requirements Associated with this Amendment

Not Applicable.

7.12 Revocation of Existing Permits and Amendments

Not Applicable.

7.13 Pollution Prevention Associated with this Amendment

Not Applicable.

7.14 Specific Conditions Associated with this Amendment

Not Applicable.

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Attachments

A. List of Standard Abbreviations and List of Permit Specific Abbreviations

Permit No.: 2631-021-0001-V-04-2

List Of Standard Abbreviations

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